

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

GESTURE TECHNOLOGY PARTNERS,
LLC,

Plaintiff,

v.

LG ELECTRONICS INC., AND LG
ELECTRONICS U.S.A., INC.,

Defendants.

C.A. No. 6:21-cv-123-ADA

JURY TRIAL DEMANDED

**DECLARATION OF HONGSUN YOON REGARDING
DEFENDANT LG'S OPPOSED MOTION TO TRANSFER VENUE**

I, Hongsun Yoon, declare as follows based on my personal knowledge and/or investigation. If called as a witness, I could and would testify competently to the following facts:

1. I am currently employed as Director and Senior IP Counsel at LG Electronics U.S.A., Inc. ("LGEUS"). I am responsible for intellectual property matters for LGEUS. Based upon my employment at LGEUS, I am familiar with LGEUS's operations and its interactions and relationship with LG Electronics Inc.

2. LG Electronics Inc. ("LGEKR") is a Korean corporation with its principal place of business in Seoul, South Korea. LGEKR and its employees are responsible for the design, research, development, engineering, sourcing, and manufacture and assembly of LG-branded devices, including those products accused of infringement in this case, sold in the United States. LGEKR does not have a regular and established place of business in the Western District of Texas ("WDTX").

3. LGEUS is a wholly owned subsidiary of LGEKR. LGEUS is incorporated in Delaware and is registered to do business in California. LGEUS is a separate corporate entity from LGEKR, and each entity maintains all of its respective corporate formalities. LGEUS is responsible for importing, marketing, offering for sale, and selling LG-branded products in the United States, including within Northern District of California ("NDCA"). LGEUS also controls and operates LG's United States website—located at www.lg.com/us—through which the accused products are marketed, offered for sale, and sold through the United States, including in Northern California. LGEUS has around 100 employees working in its offices in Santa Clara and Napa within NDCA. LGEUS also owns (not leases or rents) an office facility dedicated to its mobile business in San Diego, which is in the Southern District of California ("SDCA"). The San Diego office has about 30 employees.

4. I understand that, in this litigation, Gesture Technology Partners, LLC (“GTP”) alleges patent infringement based on certain LG-branded smartphones and tablets with Tracking Focus, Picture Face Recognition, Selfie Focus, Portrait Mode, Gesture Shots, Gesture Shutter Take, Hand ID, Air Motion, Auto Shot, and 3D AR Stickers (“Accused Features”). These Accused Products incorporate components supplied by Google and Xperi, both of which are located within NDCA, and incorporate components supplied by Qualcomm, which is located within SDCA. Neither LGEKR nor LGEUS is involved in the design, research, or development of Google’s, Xperi’s, or Qualcomm’s respective products. LG employees from both LGEUS and LGEKR regularly communicate and interact with Google personnel located in NDCA in connection with the Accused Products. For example, LGEKR employees have travelled to NDCA to meet with Google employees and LGEUS employees and to SDCA to meet with Qualcomm employees and LGEUS employees in connection with the Accused Features that stem from their respective products.

5. There are no LGEUS or LGEKR offices or facilities located in WDTX. LGEUS does not own, rent, or lease any facilities located in WDTX and has not done so within at least the past five years. In particular, LGEUS does not own, rent, or lease space at 9420 Research Blvd, Austin, Texas 78759 and does not have any employees, agents, or operations at that address. Based upon an investigation of LGEUS’s records, I am unable to discern any basis for GTP’s allegation that LGEUS has an office or facility at that address.

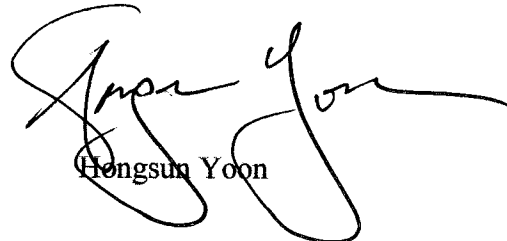
6. LGEUS also does not own, rent, or lease, either directly or indirectly, space at 9600 Great Hills Trail, Suite 150W, Austin, Texas 78759. Based upon a public search, it appears that that facility is associated with LG Display America Inc., which is not LGEUS. LGEUS is a separate company from LG Display America Inc. I understand that LG Display America Inc. is a

subsidiary of LG Display Co., Ltd., a Korean corporation separate from LGEKR. LGEUS has no direct corporate relationship to any LG Display entity. LGEUS does not conduct any business at that address, does not employ any employees or agents who work at that address, and does not exercise any control over LG Display America Inc.'s activities, if any, at that address (or elsewhere).

7. LGEUS's only employees in WDTX are three (3) work-from-home employees, who are not required to live in WDTX as a condition of their employment, do not store LGEUS inventory, or meet LGEUS customers at their homes. None of their work relates to the products at issue in this litigation. LGEUS does not own, rent, lease, or pay for any portion of the home of any of those employees.

8. To the best of LGEUS's knowledge, there are no LGEUS or LGEKR documents, witnesses, or employees in WDTX relating to the accused products or any other LG-branded mobile products. The three LGEUS employees working from home in Texas do not have any job duties related to the accused products; instead, their work concerns other types of products, such as air conditioners and digital signage. LGEKR has no employees located in WDTX. LGEKR's employees, including its engineers, and documents are located in South Korea.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on July 2, 2021, in Carmel, Indiana.



Hongsun Yoon